

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JACQUELINE SMITH,

Plaintiff,

vs.

Case No. 2:10-cv-13470-PJD-MAR

Hon. Patrick J. Duggan

CO/OP OPTICAL SERVICES, INC.

a Michigan non-profit corporation,

Defendant.

SOMMERS SCHWARTZ, P.C.

BY: DANIEL D. SWANSON, (P-29288)

JESSE L. YOUNG, (P-72614)

Attorneys for Plaintiff

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PLUNKETT COONEY

BY: MARY P. CAULEY, (P38548)

GARY W. FRANCIS, (P63738)

Attorneys for Defendant

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(248) 901-4000

PLAINTIFF'S FIRST AMENDED WITNESS LIST

NOW COMES Plaintiff, Jacqueline Smith, by and through her attorneys, Sommers Schwartz, P.C., and for her first amended list of witnesses to be utilized at the time of trial, states as follows:

1. Jacqueline Smith.
2. Larry Smith, Esq.
3. Raymond Murphy.
4. Marc Stepp.
5. Blair McGowan.
6. LaChandra White.
7. Bob Morris.

8. Bernice Adams.
9. Janna Garrison.
10. James Neblett.
11. Leatha Larde.
12. Al Garret.
13. Ted Winiarski.
14. Ben Edwards.
15. Charles Benson.
16. Nicole Naught.
17. Joshua Lange.
18. Temeng Darko.
19. Matthew Groen.
20. Armida Parisi.
21. Dawn Schuck.
22. Joe Mathis.
23. Sharmien Scott.
24. Sherold Riddles.
25. Bernard Davis.
26. Larry Gardner.
27. Jim Gerber.
28. Andrew Broder, Esq.
29. Yahoness Bolds.
30. Dr. Rosalind E. Griffin.

31. Sue Ellen Eisenberg, Esq.
32. Dr. Lanore Najor.
33. Dr. Robert Pohl.
34. Dr. Jerold Shagrin.
35. Plaintiff reserves the right to call the Custodian of Records of:
 - a. Defendant.
 - b. Hungerford & Co.
 - c. Beaumont Hospitals.
 - d. Bank of America.
 - e. Michigan's Department of Labor and Economic Growth.
 - f. Michigan Office of Financial and Insurance Regulation.

36. Plaintiff reserves the right to call past and present employees of Defendant, employees of its parent companies and subsidiaries, and all past and present agents, officers, and representatives of the same.

37. Plaintiff reserves the right to call all past and present customers of Defendant that have ever met or spoken with Plaintiff, including all past and present agents, officers, and representatives of the same.

38. Plaintiff reserves the right to call past and present employees of Michigan's Department of Labor and Economic Growth, including all of its past and present agents, officers, and representatives.

39. Plaintiff reserves the right to call past and present employees of Michigan Office of Financial and Insurance Regulation, including all of its past and present agents, officers, and representatives.

40. Plaintiff reserves the right to call past and present employees of Hungerford & Co., employees of its parent companies and subsidiaries, and all past and present agents, officers, and representatives of the same.

41. Plaintiff reserves the right to call past and present employees of Beaumont Hospitals, employees of its parent companies and subsidiaries, and all past and present agents, officers, and representatives of the same.

42. Plaintiff reserves the right to call past and present employees of Bank of America, employees of its past and present parent companies and subsidiaries, and all past and present agents, officers, and representatives of the same.

43. Plaintiff reserves the right to call past and present employees of Dr. Rosalind E. Griffin, and all past and present agents, officers, and representatives of the same.

44. Plaintiff reserves the right to call past and present employees of Dr. Lanore Najor, and all past and present agents, officers, and representatives of the same.

45. Plaintiff reserves the right to call past and present employees of Dr. Robert Pohl, and all past and present agents, officers, and representatives of the same.

46. Plaintiff reserves the right to call past and present employees of Dr. Jerold Shagrin, and all past and present agents, officers, and representatives of the same.

47. Plaintiff reserves the right to call any and all persons identified in discovery in this matter and incorporates their identity within this Witness List as though more fully set forth herein.

48. Plaintiff reserves the right to call all witnesses identified in and listed in all pleadings, answers to Interrogatories, discovery requests, and/or depositions.

49. Plaintiff reserves the right to call expert witnesses to be named at a later date depending upon the scope of further discovery.

50. Plaintiff reserves the right to call all lay witnesses and experts identified by Defendant, and not objected to by Plaintiff, whether called or not.

51. Plaintiff reserves the right to call all persons, not objected to by Plaintiff, identified in those documents produced during discovery.

52. Plaintiff reserves the right to call any and all witnesses necessary for rebuttal.

53. Plaintiff reserves the right to alter, amend, delete, modify, supplement, or add to this Witness List as may become necessary by subsequent investigation, discovery, and/or to meet or refute new or additional issues that may be raised during the course of this litigation. Further, Plaintiff reserves the right to file Amended Witness Lists from time to time for this purpose.

/s/ Jesse L. Young (P-72614)
JESSE L. YOUNG, (P-72614)
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Dated: February 28, 2011

Certificate of Service

I hereby certify that on February 28, 2011, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:
mcauley@plunkettcooney.com

/s/ Jesse L. Young, (P-72614)
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